

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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IN RE GRAND JURY SUBPOENA )  
PROCEEDING v. CORREIA, et al )  
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 )  
 ) Docket No. 05-MC-10206-MBB  
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**ASSENTED-TO MOTION FOR MODIFICATION OF RELEASE CONDITIONS**

The material witnesses in the above-captioned matter (the "Witnesses"), identified in the attached Pretrial Services Memorandum, dated May 20, 2005, hereby move the Court to modify the conditions of their release.

The Witnesses currently are being housed at the Holiday Inn at 225 McClellan Highway, Boston. The Witnesses respectfully request that they be relocated to the Mariners House at 11 North Square, Boston. The Mariners House will provide the Witnesses with more suitable lodging and will provide them with easier access to counsel. All other conditions of release will remain in place. If this Motion is granted, the Witnesses will be relocated on Wednesday, May 25, 2005.

Pretrial Services has no objection to this Motion. The United States Attorney's Office has assented to it.

WHEREFORE, the Witnesses respectfully request that this Motion be granted.

Respectfully submitted,

Maurice Correia  
Joe Cherian  
Jagdish Chand  
Raj Rajesh Fernando  
Ranjish Mukulam  
Menom M. Sivadas  
Ankur Srivastav

By their attorneys,

/s/ Douglas S. Brooks

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Dated: May 24, 2005

# EXHIBIT A



## MEMORANDUM

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**To:** Honorable Marianne B. Bowler, U.S. Magistrate Judge  
**From:** David A. Picozzi, U.S. Pretrial Services Officer  
**Re:** MATERIAL WITNESSES (See List)  
**Date:** May 20, 2005

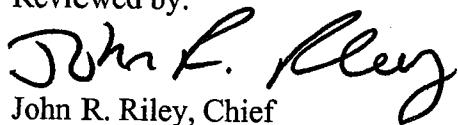
On May 20, 2005 Pretrial Services Officer, David Picozzi and EM Christopher Wylie conducted interviews of the above listed material witnesses. Each individual was represented by counsel throughout the interview process. Due to the extensive number of interviews and time constraints, regrettfully we are unable to provide pretrial reports at this time.

After consulting with counsel, Pretrial Services would suggest the following conditions of release be imposed for each individual named in this matter:

Personal Recognizance  
Maintain residence as designated by the Court  
Report to pretrial services as directed  
Surrender all passports and travel documents to Pretrial Services  
Travel is restricted to the Metropolitan Boston area  
No access to any points of egress (ie. airport terminals, train stations, ports of call)  
Notify Pretrial of any new arrests and contacts with law enforcement within 24 hours  
Statutory conditions of release

DAP/ls

Reviewed by:

  
John R. Riley, Chief  
U.S. Pretrial Services Officer

**MATERIAL WITNESSES**  
**In Re Grand Jury Proceeding (M/V MSC Elena)**

<i>Name</i>	<i>Rank</i>	<i>Attorney</i>	<i>Birth Date</i>	<i>Passport or Seaman's Passport No.</i>
Maurice Correia	Motorman	Frank Libby	11/17/1968	A2877062
Joe Cherian	Wiper	Frank Libby	10/04/1979	A9799308
Jagdish Chand	Third Engineer	Frank Libby	10/25/1963	A1081043
Raj Rajesh Fernando	Motor Man	Frank Libby	02/10/1969	A4001683
Aman R. Mahana	Second Engineer	Peter Ball	03/08/1976	E3839434
Ranjish Mukulam	Fourth Engineer	Frank Libby	05/03/1975	B0053778
Mani Singh	Chief Engineer	Josh Levy	06/10/1948	E4397396
Menom M. Sivadas	Master	Frank Libby	07/31/1953	F3368599
Ankur Srivastav	Junior Engineer	Frank Libby	02/24/1982	E8349845